



**DEPARTMENT OF BUSINESS AND INDUSTRY  
TAXICAB AUTHORITY**

**MINUTES OF THE FEBRUARY 18, 2026 BOARD WORKSHOP PUBLIC MEETING**

**1. Call to Order and Opening Remarks**

The workshop was called to order by Vice Chair Graf, who stated that the purpose of the meeting was to conduct a duly noticed workshop to solicit public comment on proposed amendments and repeals to regulations contained in LCB File No. R006-25, including the required consideration of potential small business impacts.

**2. Pledge of Allegiance**

Vice Chair Graf requested Member Decker to lead the Pledge of Allegiance. The pledge was recited in unison.

**3. Compliance with Open Meeting Law**

Vice Chair Graf inquired whether all requirements of Nevada's Open Meeting Law were satisfied. The Secretary confirmed compliance, including proper notice, posting, and receipt of materials. Hearing no concerns, the Chair proceeded.

**4. Workshop Purpose and Procedural Outline**

Chair Reaser outlined the structure of the workshop:

1. Staff would first identify any sections of the draft regulations requiring clarification or modification.
2. Public comment would be taken section-by-section, beginning with Section 2.
3. Board discussion would follow.
4. The workshop would conclude with required discussion on small business impact.
5. After completing R006-25, the Board would separately discuss the Chair's draft language relating to potential permanent integration of transportation network company (TNC) ride-referrals.

The Chair noted that Sections 2 through 16 consist of new procedural and governance

provisions addressing identified issues since 2021, particularly related to handling confidential information and establishing clearer administrative processes.

## **5. Staff Inquiry – Opening Discussion**

The Chair asked Administrator Todd Park and Staff Attorney Lona Webb whether they had identified any sections requiring preliminary comment.

Administrator Park requested a brief pause to consult with a representative from the Labor Commissioner's Office regarding Section 29(3)(d). Following the consultation, Administrator Park stated staff had no initial modifications to present.

## **6. Section-by-Section Review of LCB File No. R006-25**

The Chair opened public comment and Board discussion on each section.

### **Sections 2 through 7 — Procedural and Governance Provisions**

No public comments were offered for Sections 2–7.

The Chair reiterated that these provisions modernize administrative processes, including docketing and procedural expectations.

Regarding docketing, the Chair inquired whether the Authority had considered the mechanics and cost implications of implementing a docket numbering system. Administrator Park responded that the Authority receives relatively few filings, and staff did not anticipate difficulties.

### **Sections 8 through 16 — Confidential Information & Protective Procedures**

#### **General Overview**

The Chair explained that Sections 8–16 strengthen regulatory frameworks governing confidential information, replacing prior ad-hoc practices. Recent matters demonstrated the need for explicit procedures.

#### **Definition of “Staff of the Authority”**

The Chair asked whether the phrase “staff of the authority” should instead reference the Administrator due to the sensitive nature of certain confidential submissions and because other agencies using “staff” (PUC, NTA) have designated divisions.

Administrator Park agreed that “Administrator or designee” would be more appropriate.

Staff Attorney Webb concurred.

#### **Definition of “Service” and Certificate of Service**

Vice Chair Graf raised concerns regarding the term “served,” noting that the Authority must ensure the regulations clearly describe acceptable service methods. Staff Attorney Webb agreed to review and confirm cross-references to existing service requirements.

## Timing Requirements for Confidential Testimony

The Chair raised concerns about Section 13(2), suggesting the regulation include a minimum number of days by which confidential material must be provided to affected parties prior to filing testimony. Discussion followed on whether three or five days was appropriate.

After comparing timelines with Nevada public records requirements, the Board agreed to require five calendar days unless parties agree otherwise.

## Clarification of Section 16 — Access to Confidential Information

The Chair noted that Section 16(3), as drafted, could inadvertently limit access only to Authority staff even when protective agreements authorize broader disclosure. The Board agreed to revise the subsection to state:

- Access is limited except as provided under an agreement of the parties or order of the presiding officer, and
- “Administrator” should replace “staff of the authority.”

## Section 23 — Terminology for Vehicle Incidents

The Chair recommended striking the word “crash” and replacing it with “collision,” explaining that “accident” is disfavored and “collision” better aligns with industry and enforcement terminology.

Members and staff agreed.

## Section 24 — Out-of-Service Procedures

The Chair observed that the final sentence should reference “Administrator” rather than “authority,” because determinations to place a vehicle out of service fall under administrative, not Board, authority.

Staff and Board members concurred.

A representative from the Nevada Transportation Authority commented that “authority” can create confusion because NRS 706 defines “authority” as the NTA, while TA regulations use the same term differently. The Chair explained that TA regulations contain their own definition of “authority,” and statutory cross-application is limited.

## Section 27 — Door Locking Mechanisms

The Chair sought clarification that automatic door locks would not prevent a passenger from exiting a vehicle following a collision if the driver were incapacitated. Administrator Park confirmed that passengers retain the ability to unlock doors independently.

## Section 29 — Employee vs. Independent Contractor Leasing Provisions

Extensive discussion occurred regarding Section 29(3)(d), relating to whether employee-drivers may lease vehicles from their employer.

Administrator Park reported that the Labor Commissioner's Office indicated:

- They can enforce worker-classification matters regardless of TA regulations;
- They are not opposed to TA retaining existing language; and
- Any review of alleged misclassification would be performed case-by-case.

Industry commenters expressed concern that:

- TA regulations allow "two-hat" drivers (employee + independent contractor),
- Labor Commissioner precedent may not allow such arrangements,
- Carriers need clarity to avoid inadvertent violations.

Chair Reaser emphasized:

- TA may allow two-hat roles under its regulations;
- The Labor Commissioner may still determine misclassification under labor statutes;
- Retaining regulatory clarity is preferable to perpetuating "absurd results" in current language.

### **Section 36 — Passenger Capacity**

The Chair inquired whether the six-passenger limit is consistent with seatbelt requirements and whether a conflict could arise. Administrator Park confirmed that seatbelt rules still apply independently and violations would be enforced regardless of the passenger-count provision.

### **Section 42 — Weekly Return of Vehicles**

The Chair asked whether independent contractors must return vehicles sooner than one week when mechanical issues occur. Deputy Administrator Curtis Mell confirmed that other regulations require return of a vehicle when operational defects arise, and inspectors may require immediate inspection.

### **Section 43 — Security Deposit Accounting**

The Chair asked whether eliminating the requirement for a separate bank account affects the Authority's ability to enforce proper handling of security deposits.

Administrator Park confirmed that:

- Lease templates are approved by the Authority;
- Complaints regarding refund disputes remain within TA jurisdiction;
- The change does not impede the Authority's ability to enforce lease requirements.

## 7. Conclusion of Section Review

After reviewing all sections through Section 53, no further comments or objections were raised by Board members or the public.

## 8. Additional Regulatory Amendments Outside LCB Draft (Pilot Program Framework)

The Chair noted that no written proposals for the necessary regulatory amendments to make TNC integration pilot-program permanent have been received from certificate holders or other stakeholders. Based on prior Attorney General Office guidance, the Chair prepared preliminary draft language to initiate the Board's discussion.

DAG Matthew Feeley noted potential conflicts with NRS 706.8849, which restricts taxicab companies from acting as TNCs. The Chair that the draft rules are provided as a platform for stakeholder input and will be subject to both guidance from the Attorney General's Office and the Legislative Council Bureau..

## 9. Summary of Chair's Draft (Overview Only)

The Chair summarized key provisions:

1. **Definitions** – Establish “electronic ride-hailing system” and incorporate statutory TNC definitions.
2. **Agreements** – Require certificate holders to file agreements with approved technology providers granting access to TNC ride-referral systems.
3. **Moonlighting Rule Clarification** – Address AG concerns about employees performing prohibited TNC activity unless operating through a permitted third-party (3P) integration.
4. **Technology Specifications** – Require the Administrator to approve the communications technology used to deliver TNC-originated trip referrals.
5. **Metering & Fare Transparency** – Ensure compliance with taxi meter requirements or authorize limited deviations when functionally equivalent documentation exists.
6. **Annual Reporting** – Require data submissions allowing the Authority to monitor utilization, pricing, and compliance.
7. **Rates and Charges** – Require certificate holders to file TNC-related rate information, acknowledging potential need for confidential transfer from the NTA.

## 10. Board and Staff Discussion of Draft

### Electronic Payment Terminology

Member Decker recommended replacing “electronic payment processing system” with “electronic ride-hailing system” where applicable. Chair agreed.

### 3P (“Third-Party”) Technology vs. 1P (“First-Party”)

Administrator Park recommended expressly requiring 3P systems, consistent with legal separation between TNC and taxicab operations. Chair requested assistance drafting precise definitions.

### **Clarifying “Tariff” Usage**

Board members recommended eliminating “standard tariff” and instead referring simply to “rates, charges, and fares approved by the Authority.”

## **11. Public Comment on Proposed Draft**

### **Curb Mobility Representative**

A representative from Curb Mobility provided extensive comment, including:

- Distinguishing taxi-hail apps from TNC apps;
- Clarifying that Uber provides passenger-facing disclosures, not the taxi technology provider;
- Explaining that trip flow occurs via TNC → 3P technology → taxicab;
- Recommending corrections to definitions conflating TNC and taxi technologies;
- Suggesting that certificate holders may contract directly with technology providers, not TNCs;
- Offering to submit proposed language directly to the Administrator.

### **Desert Cab & Virgin Valley Representatives**

Concerns included:

- Ensuring regulations do not unintentionally prohibit employees from performing TNC-referred taxi trips;
- Clarifying that all drivers (employees and ICs) should be eligible to receive 3P-integrated referrals;
- Eliminating language requiring carriers to distinguish employees from independent contractors for purposes of Section 3;
- Reiterating that all such trips become taxicab trips upon acceptance through the 3P system.

## **12. Small Business Impact Review**

As required under NRS 233B, the Chair invited comments regarding potential small-business impacts of the proposed regulations and proposed draft. No additional public comment was provided.

### 13. Closing Remarks

Chair Reaser thanked all participants, including industry representatives, technology providers, staff, and the Labor Commissioner's Office, for their contributions. The Chair noted that:

- Staff will incorporate discussed modifications,
- The Administrator will review any submitted language from stakeholders, and
- A revised draft will be prepared for return to LCB.

The Chair then closed the workshop.

Workshop Adjourned

By the Authority,

  
~~Dan Reaser, Chairman~~  
Nevada Taxicab Authority

Las Vegas, Nevada

Dated: ~~March 16, 2026~~

April 15, 2026

  
Rusty Court, Vice Chairman

